

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

DIVISION

CIVIL COMPLAINT

MANUELE ROBINSON AND DECEASED
WIFE BOBBIE ROBINSON

Enter above the full name of Plaintiff or Plaintiffs in this action

VS.

CASE NO. 15-395

Regional Medical Center at Memphis
University of Tenn owner of U.T. Bowld Hospital
DR. CHAN SUDDIN, DR. ABHAS CHAMSUDIN
DR. KEITH MERRILL of UT Medical Group, INC
UT Medical Group

Enter above the full name of Defendant or Defendants in this action

I. Parties to this Civil Action

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any, on back side of this sheet.)

A. Name of Plaintiff MANUELE ROBINSON AND DECEASED WIFE BOBBIE ROBINSON

Address

9315 FAIRWOOD DR.
KANSAS CITY MO 64138

B. Name of Defendant(s) Regional Medical Center, University of Tenn owner of U.T. Bowld Hospital

DR. CHAN SUDDIN, DR. ABHAS CHAMSUDIN, DR. KEITH MERRILL of UT
Medical Group INC

II. Statement of Claim

(State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. [Use as much space as you need to state the facts. Attach extra sheets if necessary.]

Unrelated separate claims should be raised in separate civil actions.)

SERVICE WAS PERFORMED AT REGIONAL MEDICAL CENTER, SERVICE WAS DONE AT UNIVERSITY OF TENN
OWNER OF U.T. BOWLD HOSPITAL, AND SURGERY WAS DONE BY DR. CHAN SUDDIN AND
DR. ABHAS CHAMSUDIN, AND DR. KEITH MERRILL REFERRED BOTH DOCTORS
TO MRS ROBINSON AND MEDICAL MEDICAL RECORD WILL SHOW CONNECTION TO THIS
CASE

III. Relief

State briefly exactly what you want the Court to do for you.

Mr. Robinson would like for the Court to make this wrongs that happen to my wife of twenty five years right and AWARD Mr Robinson and my Disable Daughter ~~four~~ Million Dollar For Negligent and BAD Decision When Doctors Did Surgery on my wife

Make no legal arguments. Cite no cases or statutes.

IV. Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☒ No ☐ With the Family

V. Do you claim actual or punitive monetary damages for the acts alleged in your complaint?

Yes ☒ No ☐

If you answered yes, state the amounts claimed and the reasons you claim you are entitled to recover money damages

Mr. Robinson would Respectfully like the Court to Award ~~four~~ Million Dollar to Me and my Daughter Because the Damage started with this Surgery and Bad Decision Pursuant to TCA 20-5-107 for INJURIES AND Merits of the CASE

VI. Counsel

Do you have an attorney to represent you in this civil action?

Yes ☐ No ☒

A. Have you made any effort to contact a private attorney to determine if he or she would represent you in this civil action?

Yes ☒ No ☐

B. If you answered yes, state the names and addresses of the attorneys contracted, and give the results of those efforts.

RICE & ASSOCIATES, BRIAN MEYERS, BRAD/BRAD SHAW, Humphrey Barnington, McClain, Barnett Law Firm, SOB2 Law Firm, Brown & Crowder, Brian Baltzell, MICHAEL WALLACE
DO NOT TAKE CASES LIKE THIS

C. If you answered no, state your reasons why no such efforts have been made.

SOME MEDICAL RECORDS AND EXHIBITS WITH THIS
CIVIL COMPLAINT TO THE COURT

VII. Administrative Procedures

- A. Have the claims which you make in this civil action been presented through any type of Administrative Procedure within any government agency?

Yes ☐

No ☒

- B. If you answered yes, state the date your claims were so presented, how they were presented, and the result of that procedure.

- C. If you answered no, give the reasons, if any, why the claims made in this action have not been presented through Administrative Procedures.

ON APRIL 17, 2014 FDA ISSUED A STATEMENT ABOUT UTERINE FIBROIDS
AND THE RISK OF SURGERY PROCEDURE IS NOT RELIABLE AND CAN SPREAD
CANCEROUS TISSUE WITHIN THE ABDOMEN AND PELVIS. MEDICAL RECORD WILL SHOW
THAT MRS ROBINSON HAD TO GET A SECOND DOCTOR TO REPAIR DAMAGE TO ABDOMEN AND
PELVIS BEFORE HER DEATH. AND MRS ROBINSON HAD NO HISTORY OF CANCER
VIII. Jury Demand BEFORE SURGERY FROM DR. CHAN SUCKLIN AND ABBAS CHAM SUCKLIN

Do you request a jury trial? Yes _____ No ☒

Signed this 4 day of MAY, 20 15

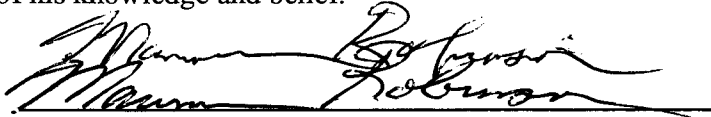
Maurice Robinson

Signature of Plaintiff or Plaintiffs

VERIFICATION

State of MISSOURI)
County of JACKSON)

ROXANNA CORTEZ-ZELAYA, being first duly sworn under oath, presents that he is the plaintiff in this action; that he knows the contents of the complaint; and that the information contained therein is true to the best of his knowledge and belief.



Signature of Plaintiff or Plaintiffs

All parties must verify

SUBSCRIBED AND SWORN TO before me this 4th day of may, 2015

Notary Public

sept. 10, 2018
My Commission Expires

